

necessary to designate expert(s) and further, for those experts to formulate expert reports in compliance with Federal Rule of Civil Procedure 26(a)(2).

4. Accordingly, T-NETIX requests that the Court grant a 45 day extension as to the deadlines to designate burden and rebuttal experts and otherwise comply with rule 26(a)(2) as follows:

- a. Designation of burden expert witnesses due: May 4, 2006; and
- b. Designation of rebuttal expert witnesses due: July 2, 2006.

6. T-NETIX's request for an extension of time is for good cause shown, as stated in this motion, not for purposes of delay.

7. VAC does not oppose and agrees to this request for an extension.

8. For the reasons stated above, T-NETIX requests that the Court grant its Motion for Extension of Expert Deadlines and order a 45 day extension to otherwise comply with Rule 26(a)(2); that the designation of burden expert witnesses be due on May 4, 2006; and that the designation of rebuttal expert witnesses be due on July 2, 2006.

Respectfully submitted,

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**ATTORNEYS FOR T-NETIX, INC., AND
SECURUS TECHNOLOGIES, INC.**

CERTIFICATE OF CONFERENCE

I, the undersigned attorney herein, hereby certify to the Court that I have conferred with counsel for Plaintiff Value-Added Communications, Inc., and Plaintiff's counsel does not oppose this motion.

Certified to the 7th day of March , 2006.




Jeffrey S. Lowenstein





CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served upon Defendant/Counter-Plaintiff's counsel via certified mail, return receipt requested, on the 9th day of March, 2006.



Gwen I. Walraven